

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

UNITED STATES OF AMERICA *

vs. * CASE NO. GLR 17-0631

NGHIA PHO *

**CONSENT MOTION TO ENLARGE TIME FOR THE FILING OF
SENTENCING MEMORANDUM**

The Defendant, by and through his attorney, Robert C. Bonsib, Esquire, respectfully requests this Honorable Court to enlarge the time for the filing of the Defendant's Sentencing Memorandum and, as reasons therefore, states as follows:

1. The Defendant's sentencing memorandum is presently due to be filed on September 11, 2018. Undersigned counsel is scheduled to review classified material that will be relevant to the sentencing hearing in this matter and that review is presently scheduled for September 12, 2018

2. Undersigned counsel wishes to have the benefit of the review of the classified information prior to filing the sentencing memorandum in this matter and is requesting that the time for filing the Defendant's sentencing memorandum in this matter be enlarged until September 13, 2018.

3. Granting this request will not interference with current schedule for sentencing in this matter.

4. Assistant United States Attorney Thomas P. Windom has authorized undersigned counsel to represent that the government consents to this request.

WHEREFORE it is respectfully requested that this Honorable Court grant the relief prayed.

Respectfully submitted,

MarcusBonsib, LLC

/s/ Robert C. Bonsib

ROBERT C. BONSIB
6411 Ivy Lane, Suite 116
Greenbelt, Maryland 20770
(301) 441-3000
Bar No. 00324

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing motion was sent via ECF this 11th day of September, 2018 to Assistant United States Attorneys Thomas P. Windom and Nicolas A. Mitchell, Office of the United States Attorney for the District of Maryland, 6500 Cherrywood Lane, Greenbelt, MD 20770.

/s/ Robert C. Bonsib

ROBERT C. BONSIB